

ENTERED

October 18, 2019

David J. Bradley, Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

UNITED STATES OF AMERICA

v.

MOHAMAD MILON HOSSAIN,

AKA Milon Miah,
AKA Milon Mia,
AKA Milon,
AKA Melon

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CRIMINAL NO. 5:18-CR-00912-S2

[PROPOSED] PROTECTIVE ORDER

Before the Court is a Joint Motion for a Protective Order. This Court hereby finds and Orders as follows:

- a. The Government will classify the discovery into two categories: (1) items not subject to the restrictions of the Court's Protective Order; and (2) sensitive material subject to the Protective Order (herein after referred to as the "protected discovery").
- b. The Government will provide the protected discovery to defense counsel in paper format, redacted as appropriate.¹ All documents will also contain Bates stamped numbers.
- c. The Government will provide the protected discovery to defense counsel marked as "SUBJECT TO A PROTECTIVE ORDER".
- d. Only the Defendant, defense counsel, and members of the defense team may view the protected discovery. However, should defense counsel wish to have other individuals view the protected discovery for the purposes of assisting in the defense of this case,

¹ If there are materials that are originally in electronic format, such as video or audio files, the Government will produce them in the same manner to the defense.

defense counsel shall submit their names to the Court in order for the Court to approve them prior to their viewing of the discovery. These individuals shall sign the acknowledgement form described in paragraph (j) below prior to viewing the discovery.

e. Defendant, and individuals approved by the Court, may view the protected discovery only for the purpose of assisting in the defense of this case. The Defendant, and those approved by the Court, will not retain custody of any of the protected discovery.

f. The protected discovery will not be provided to anyone who is not assigned to, and directly involved in, the preparation of the defense in this case.

g. Any of the protected discovery filed with the Court shall be filed under seal under the authority of this Order, except by agreement between counsel.

h. The defense team is defined as a person who is a partner or associate in defense counsel's law firm or is either a member of the Texas Bar or admitted to practice before the United States District Court for the Southern District of Texas, and is assigned to assist in the preparation of the defense in this case. Defense counsel shall keep a list of those deemed to be part of the defense team.

i. Defense counsel shall go over the terms of the protective order with the Defendant, those individuals approved by the Court, as well as any members of the defense team. Further, defense counsel shall have the Defendant, individuals approved by the Court, and defense team members sign an acknowledgement form provided by the Government, affirming that they understand the terms of the protective order and consequences of violating the protective order, prior to reviewing any of the protected discovery.

j. A copy of this Order shall be kept with the protected discovery at all times.

k. At the conclusion of this criminal case, including the final determination of any appeal, defense counsel shall return to the Government the protected discovery received pursuant to this Protective Order.

SO ORDERED.

DATED: October 18, 2019



HON. DIANA SALDAÑA
UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS